

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

**SECURITIES AND EXCHANGE COMMISSION,**

**Plaintiff,**

**v.**

**GIBRALTAR GLOBAL SECURITIES, INC.,  
and WARREN A. DAVIS,**

**Defendants.**

**13 CV 2575 (GBD) (JCF)**

**PLAINTIFF'S REQUIRED INITIAL DISCLOSURES**

Plaintiff, the Securities and Exchange Commission ("SEC" or "Commission"), submits to defendants the following required initial disclosures pursuant to Rule 26(a), F.R.Civ.P.

**Rule 26(a)(1)(A)(i):** The Commission at this time believes the following witnesses have discoverable information relating to facts supporting the Commission's allegations. This list is subject to updating as discovery proceeds.

<b>Person or Entity</b>	<b>Address or Counsel Address</b>	<b>Nature of Information</b>
Warren A. Davis		
Magnum d'Or Resources, Inc.	c/o Stephen A. Zrenda, Jr., Esq. Stephen A. Zrenda, Jr., P.C. 6303 N. Portland Avenue, Suite 300 Oklahoma City, OK 73112 Telephone: 405-721-7300 Facsimile: 405-601-0802 Email: zrendaEsq@aol.com	Issuer
Dwight Flatt	101 S. Fort Lauderdale Beach Blvd. #1205 Fort Lauderdale, FL 33316 Telephone: 954-294-1842 Email:	MDOR Seller/Gibraltar customer

	dwightflatt@yahoo.com	
Joseph J. Glusic	c/o Stacy E. Nathanson, Esq. 30 Rockefeller Plaza, 26th Floor New York, NY 10112	MDOR CEO, CFO, President and Treasurer
Shannon Allen	c/o David Chase, Esq. The Law Firm of David R. Chase, P.A. 1700 East Las Olas Boulevard, Suite 305 Fort Lauderdale, FL 33301	MDOR seller/Gibraltar customer
David Della Sciucca, Jr	Not known	MDOR seller/Gibraltar customer
Maicol Diaz	Unique Photography & Design 250 NW 23rd Street, Suite 411 Miami Wynwood Art District, FL 33127 (305) 788-0102	MDOR seller
Maritza Meza	c/o Allan M. Lerner, Esq. Law Offices of Allan M. Lerner, P.A. 2888 East Oakland Park Boulevard Fort Lauderdale, Florida 33306 Phone: (954) 563-8111	MDOR seller
Jason DeOliveira	c/o Christopher Bruno, Esq. Bruno and Degenhardt 10615 Judicial Drive Suite 703 Fairfax, VA 22030	MDOR seller
Kyle Roberts	1669 Sturbridge Drive Sewickley, PA 15143	MDOR seller
Chad Curtis	c/o William Nortman, Esq. Akerman Senterfitt 350 East Las Olas Blvd. Fort Lauderdale, FL 33301	MDOR CEO, CRO, president and treasurer from December 2006 to January 2008
Rebecca Rieger	c/o James Sallah, Esq. Sallah & Cox, LLC 2101 NW Corporate Blvd. Suite 218 Boca Raton, FL 33431	MDOR seller/DeOliveira girlfriend
Holladay Stock Transfer, Inc.	2939 North 67th Place Scottsdale, Arizona 85251	Stock transfer agent
MJL Holdings	CEO K Troy Lowman	Gibraltar customer

	2982 Pebble Beach Drive Ellicott City, MD 21042	
Penson Financial Services	1700 Pacific Avenue Suite 1400 Dallas, TX 75201	Broker-dealer
Spartin Equity Consultants	c/o Dwight Flatt 101 S. Fort Lauderdale Beach Blvd. #1205 Fort Lauderdale, FL 33316 Telephone: 954-294-1842 Email: dwightflatt@yahoo.com	Flatt owned company
E*TRADE Financial	135 E. 57th Street New York, NY 10022	Broker-dealer
Oppenheimer & Co., Inc. Rocco Petito, Branch Manager Andrew Palyvoda AML Officer Dina Hochhuaser Broker Assistant Jeffrey Wechsler RR Gibraltar account Blake Golding RR Gibraltar account Eli Moallem RR Gibraltar account	Ellen Shreidan-Cona, Esq. 125 Broad Street New York, NY 10004	Broker-dealer
Scottsdale Capital Joseph Padilla, Andrea Bruno, Stephanie Bruno, Michael Cruz, John Hurry, Phillip Koehnke	7170 E. McDonald Road, Suite 6 Scottsdale, AZ 85253	Broker-dealer
Stock USA Investments	1717 Route 6 Carmel, NY 10512	Broker-dealer
Pershing LLC	One Pershing Plaza Jersey City, NJ 07399	Broker-dealer
Wilson-Davis & Company	236 South Main Street Salt Lake City, UT 84101	Broker-dealer
Edward Jones	1245 JJ Kelley Memorial Drive St. Louis, MO 63131	Broker-dealer
Fidelity Investments	155 Seaport Blvd. Boston, MA 02210	Broker-dealer
Citibank	100 Citibank Drive San Antonio, TX 78245	MDOR bank accounts

Cache Bank & Trust	P.O. Box 337060 4601 West 20th Street Greeley, CO 80633	MDOR accounts
Valley Bank	4900 East Bromley Lane Brighton, CO 80601	MDOR accounts
Magnum Recycling USA		MDOR affiliate
Green Spirits Managerial Consultants	401 Federal Street- Suite 4 Dover, DE 19901	MDOR seller
Bank of America	P.O. Box 407090 Ft. Lauderdale, FL 33340	MDOR account; Sciucca account
TD Ameritrade	4211 South 102nd Street Omaha, NE 68127	Broker-dealer
Ridge Clearing & Outsourcing Solutions, Inc.	2 Journal Square Plaza Jersey City, NJ 07306	Broker-dealer
Alpine Securities	440 East 400 South Salt Lake City, UT 84111	Broker-dealer
Royal Bank of Canada	Traitement des mises en demeure CP 6001, Succursale A Montreal (Quebec) H3C 3A9	MDOR account/Gibraltar accounts
Recyclage Magnum, Inc.		Issuer affiliate
Wachovia/Wells Fargo	301 S. College Street MAC 1053-300 Charlotte, NC 28288	Shannon Allen account
JP Morgan Chase	270 Park Ave New York, NY 10017 (212) 270-6000	Bank transfers
Overview Advisers Robert Farrell	7550 Wolf River Blvd. Suite 100 P.O. BOX 383347, Germantown, TN 38138-1779 901-761-1750   800-723-1750 Fax: 901-415-5075	Gibraltar customer
Financial Industry Regulatory Agency	1736 K St. NW Washington, D.C. 20006	Regulator
Dualstar Media, Inc.	13140 Creek View Apt 203 Garden Grove, CA 92844-1279	Stock promoter
Sunrise Consulting Group, Inc.		Issuer
Action Stock Transfer	7069 S. Highland Drive Suite 300 Salt Lake City, Utah 84121	Transfer agent
Mark Grober Edward Bronson	Contact information is in the possession of the defendants;	Gibraltar customers

Market Solutions Cape McKinnin Inc Oxford Advisers Daniele Forigo Fairhills capital Prezense Inc. William Mackey VNC Associates Complete Advisory Partners LLC Delta Consulting Group, Inc. Peter Laipnieks Alan Rothman Luke Zouvas Michael Brown Newport Holdings Inc. Jennifer Pellegrino Knight Consulting Corp RBM Financial Inc. J. Scott Watkins Ronald C. Touchard Misty Tochar Bransville Investments Jon Michael Pealy Jack Hunter Stapleton Jim Can Richard Smith Robert Rosner Indiah Wells Las Vans Partners Nettle Hanover John Milardovic Sealine Electrical Salim Rogers Bradsville Investments LFG Capital Corp PHP Holdings Rolf Amato Island Capital Management Antonio Papa Dan Forigo Jean Sebastian Ollu Jacque Valle Marc Alexander Raynault Northshore & Chelsea Dimitrios Liakopoulos	plaintiff has only piecemeal information for most of these investors from b-d documents.	
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Rene Calabrigo Queensway Holdings Ltd. Yevleniy Krupsky Andrew Geoffrey Pixel Arcanum, Inc. Caustic Ventures, LLC Havannah Gerald Knapton The Good One, Inc. Bedford International QM Investment Ltd. May Joan Liu Pinks & BB LLC Brian Combs Patricia Demming Oceanic Consulting, LLC New Quay Management Limited Green Stone Holdings Sweet Challenge Inc. Tucker Investments		
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**Rule 26(a)(1)(A)(ii):** The Commission expects to be able to provide defense counsel with documents produced in the Commission’s Magnum d’Or and Gibraltar investigations on a rolling basis beginning approximately August 26. There are nearly two million documents to be produced and a rolling production should be more manageable than a single large production at a later date. Rolling production will continue to completion.

**Rule 26(a)(1)(A)(iii):** The SEC does not seek “damages” as the term is used in the rule. Instead, the Commission’s statutes provide for civil penalties and the Commission typically seeks disgorgement of proceeds of unlawful conduct. Civil penalties are provided by Sec. 20(d) of the Securities Act of 1933, 15 U.S.C. §77t(d), and Sec. 21(d)(3) of the Securities Exchange Act of 1934, 15 U.S.C. § 78u(d)(3). For disgorgement purposes, a accounting of proceeds of the defendants’ unlawful conduct must await completion of discovery, especially production of

records showing the total amount of unlawful MDOR sales, for which defendants are jointly and severally responsible to disgorge along with the MDOR litigation defendants, and a calculation of all commissions and other forms of profit realized by the defendants from solicited transactions with U.S. customers in MDOR and other securities.

**Rule 26(a)(1)(A)(iv):** The Commission has no insurance agreements relevant to this law enforcement action.

Date: August 12, 2013

Respectfully submitted,

/s/James A. Kidney  
James Kidney (JK 4830)  
Robert Giallombardo  
Attorneys for Plaintiff  
SECURITIES AND EXCHANGE COMMISSION  
100 F Street NE  
Washington D.C. 20549  
(202) 551-4441  
(202) 772-9282 (Fax)  
**kidneyj@sec.gov**

**CERTIFICATE OF SERVICE**

I hereby certify that on August 12, 2013, that the following counsel for the Defendants was served via email the attached Rule 26 required initial disclosures.

Nicholas M. De Feis, Esq.  
Philip Patterson, Esq.  
DE FEIS O'CONNELL & ROSE, P.C.  
New York New York 10110  
(212) 768-1000  
Attorney for the Defendants

/s/JAMES A. KIDNEY

